

1 **YI LIN ZHENG, ESQ.**  
Nevada Bar No. 10811  
2 **VEGAS GOLDEN LAW**  
3 2801 S Valley View, Ste 16  
Las Vegas, Nevada 89102  
4 Phone: (702) 385-7170  
5 [VegasGoldenLaw@gmail.com](mailto:VegasGoldenLaw@gmail.com)  
6 Attorney for Defendant  
STEPHON JAMES WHITNEY

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA, )  
10 ) CASE NO. 2:21-CR-002-JAD-NJK  
Plaintiff, )  
11 )  
vs. )  
12 )  
STEPHON JAMES WHITNEY, )  
13 )  
14 Defendant. )  
\_\_\_\_\_ )

15 **STIPULATION TO CONTINUE PRETRIAL MOTION DEADLINES,**  
16 **CALENDAR CALL AND TRIAL DATE (Second Request)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between CHRISTOPHER CHU,  
18 Acting United States Attorney, and DANIEL COWHIG, Assistant United States Attorney,  
19 counsel for the United States of America, and YI LIN ZHENG, ESQ. counsel for STEPHON  
20 JAMES WHITNEY that the calendar call currently scheduled for August 16, 2021, at 1:30 p.m.,  
21 and the trial currently scheduled for August 24, 2020, at 9:00 a.m., be vacated and continued for  
22 at approximately 75 days to a date and time convenient to this Court but not sooner than  
23 November 1, 2021 for a trial date.

24  
25  
26 This stipulation is entered into for the following reasons:

- 27 1. Counsel for the defendant needs additional time to conduct an investigation in this  
28

1 case, in order to determine whether there are any pre-trial issues that must be litigated and  
2 whether the case will ultimately go to trial or will be resolved through negotiations and/or to  
3 prepare for trial.

4           2. Defendant STEPHON JAMES WHITNEY is in custody but has been advised and  
5 does not object to the continuance.  
6

7           3. The additional time requested herein is not sought for purposes of delay, but  
8 merely to allow counsel for defendant sufficient time within which to be able to effectively  
9 complete investigation of discovery materials and to further discuss the case with defendant.  
10

11           4. The additional time requested by this stipulation is excludable in computing the  
12 time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,  
13 U.S.C. §3161(h)(7); and Title 18, U.S.C. §3161(h)(7)(A), when considering the factors under  
14 Title 18, U.S.C. §3161(h)(7)(B), §3161(h)(7)(B(i) and §3161(h)(7)(B)(iv).  
15

16           5. This is the second request for a continuance filed herein.

17           DATED: July 22, 2021

18           CHRISTOPHER CHU  
19           Acting United States Attorney

                  VEGAS GOLDEN LAW  
                  Formerly Momot & Zheng

20           By /s/ Daniel Cowhig  
21           DANIEL COWHIG  
22           Assistant United States Attorney  
                  Counsel for Plaintiff

By /s/ Yi Lin Zheng  
                  YI LIN ZHENG, ESQ.  
                  Counsel for Defendant  
                  STEPHON JAMES WHITNEY



1 Title 18, U.S.C. §3161(h)(7)(B), §3161(h)(7)(B(i) and §3161(h)(7)(B)(iv).

2 5. This is the second request for a continuance filed herein.

3 For all of the above-stated reasons, the ends of justice would best be served by a  
4 continuance.  
5

### 6 CONCLUSIONS OF LAW

7 The ends of justice served by granting said continuance outweigh the best interest of the  
8 public and the defendant in a speedy trial, since the failure to grant said continuance would be  
9 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the  
10 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into  
11 account the exercise of due diligence.  
12

13 The continuance sought herein is excludable under the Speedy Trial Act, Title 18, U.S.C.  
14 § 3161(h)(7); and Title 18, U.S.C. § 3161(h)(7)(A), when considering the factors under Title 18,  
15 U.S.C. § 3161(h)(7)(B), § 3161(h)(7)(B)(i) and § 3161(h)(7)(B)(iv).  
16

### 17 ORDER

18 **IT IS HEREBY ORDERED** that each party shall have 45 days from the date of this  
19 Order to file all pretrial motions. Responses to any motions shall be filed within 14 days from  
20 the date of service of the motions; and any replies may be filed within 7 days of service of the  
21 responses.  
22

23 **IT IS FURTHER ORDERED** that the trial briefs, proposed voir dire questions,  
24 proposed jury instructions, and a list of exhibits must be submitted to the Court by  
25 \_\_\_\_\_, 2021.  
26  
27  
28

**IT IS FURTHER ORDERED** that the calendar call currently scheduled for August 16, 2021, be vacated and continued to \_\_\_\_\_, 2021, at \_\_\_\_\_ and the trial currently scheduled for August 24, 2021, be vacated and continued to \_\_\_\_\_, 2021, at \_\_\_\_\_, in Courtroom \_\_\_\_\_.

Dated: \_\_\_\_\_.

JENNIFER A. DORSEY  
UNITED STATES DISTRICT JUDGE